

James Alan Bush
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Plaintiff in pro per

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RICHARD W. WIEKING CLERK
U.S. DISTRICT COURT
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JUN 25 2008

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

RICHARD W. WIEKING CLERK, U.S. DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE

DB

James Alan Bush,) Case No.: C 08-01354 (RS) JF
Plaintiff,)
v.) NOTICE OF MOTION AND MOTION TO
Sunnyvale Department of Public) COMPEL MANDATORY DISCLOSURE
Safety, et al.,)
Defendants.) [Fed. R. Civ. P. 26(a), 37(a),
ND Cal. Civ. LR 3-4(a)(1)]
Magistrate Judge Richard Seeborg

NOTICE OF MOTION AND MOTION TO COMPEL MANDATORY DISCLOSURE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

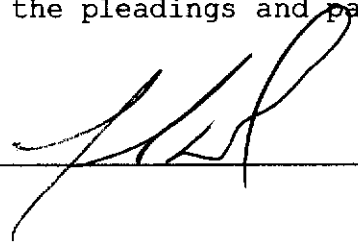
Please take notice that on Wednesday, June 25th, 2008, at 9:30 AM,
or as soon thereafter as the parties may be heard, Plaintiff will
move this Court, at the Robert F. Peckham Federal Building, located at
280 South First Street, Courtroom 3, for:

1 (1) An order pursuant to Federal Rules of Civil Procedure, Rule 26(a)
2 and Rule 37(a)(3)(A), requiring Defendant, Kathy Bickel, to make
3 the mandated disclosures as described in the Interrogatory to
4 Defendant, Kathy Bickel, attached hereto as Exhibit A, on the
5 grounds that the defendant failed to make the necessary disclosures
6 related to expert testimony; and,

7 (2) An order pursuant to Federal Rules of Civil Procedure, Rule 26(a)
8 and Rule 37(a)(3)(A), requiring Defendant, Kathy Bickel, to make
9 the mandated disclosures as described in the Request for Mandatory
10 Disclosures and Informal Discovery, attached hereto as Exhibit B,
11 on the grounds that the defendant failed to make the necessary
12 disclosures related to expert testimony.

13 Plaintiff has made prior attempts to meet and confer with the
14 defendant in regards to the disclosure obligations under Rule 26(a) of
15 the Federal Rules of Civil Procedure; however, the defendant refused,
16 and continues to refuse, to comply with this requirement.

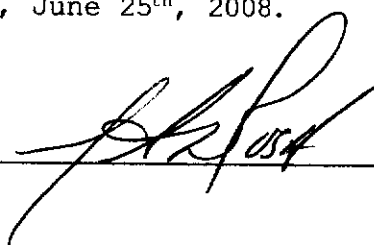
17 This motion is based on this Notice of Motion and Motion, the
18 accompanying Certificate of Good-Faith Attempts to Resolve Discovery
19 Dispute, and the pleadings and papers on file in this action.

20
21 Plaintiff:  _____

Dated: 6-25-08

CERTIFICATE OF SERVICE

A copy of the above Notice of Motion was emailed to Kathy Bickel,
on Wednesday, June 25th, 2008.

Plaintiff: 

Dated: 6-25-08